

DOCKET SECTION  
BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 1997

Docket No. R97-1

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA  
NOTICE OF INTENT TO CONDUCT ORAL CROSS-EXAMINATION AND  
DESIGNATION OF WRITTEN CROSS-EXAMINATION OF  
UNITED STATES POSTAL SERVICE WITNESS  
RALPH J. MODEN (USPS-T4)  
October 16, 1997**

The Newspaper Association of America ("NAA") hereby gives notice of its intent to conduct oral cross-examination of United States Postal Service witness Ralph J. Moden (USPS-T4) regarding the witness's testimony and interrogatory responses designated by NAA.

NAA designates the following interrogatory responses as its written cross-examination of this witness: NAA expects to focus its cross examination principally on the witness's testimony regarding staff utilization and productivity.

NAA/USPS-T4	1-17
TW/USPS-T4	7,11,14,15
DMA/USPS-T4	3, 6, 9, 11, 12, 14, 18, 25, 30, 40, 41, 42, 48, 54
DMA/USPS-T14	1, 23(c) (redirected from USPS witness Michael D. Bradley)
NDMS/USPS-T28	20(a) (redirected from USPS witness Charles L. Crum)
FGFSA/USPS-T4	5
UPS/USPS-T14	58 (redirected from USPS witness Michael D. Bradley)
ADVO/USPS-T41	7, 8 (redirected from USPS witness William M. Takis)
MPA/USPS-T4	13
MPA/USPS-T13	12, 13 (redirected from USPS witness Michael D. Bradley)

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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### **CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

October 16, 1997

  
Michael Yourshaw